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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

ADTRADER, INC. et al.,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Case No. 5:17-CV-07082-BLF

**PLAINTIFFS' RESPONSE TO GOOGLE'S
ADMINISTRATIVE MOTION FOR A
PROTECTIVE ORDER PURSUANT TO
CIVIL LOCAL RULE 7-11**

1 Plaintiffs disagree with Google's contention that FRCP 26(b)(5)(B) requires Plaintiffs to
2 accede Google's request to substitute a redacted version of the disputed document in the Court's
3 file. Plaintiffs understand that rule to relate to disclosures by the receiving party to experts, legal
4 services vendors, and the like and not to disclosures to the Court itself through filings. Given
5 Plaintiffs' understanding of this rule and Plaintiffs' contention that Google waived privilege as to
6 this document because (among other reasons) Plaintiffs had either copy and pasted the allegedly
7 privileged email or quoted the entirety of that allegedly privileged email in four different filings
8 made with the court six months ago, without complaint from Google, Plaintiffs oppose
9 substituting the redacted documents for the unredacted documents currently under seal in the
10 Court's files.

11 Plaintiffs agree with Google, however, that the Court need not resolve this motion until
12 after resolving the parties forthcoming joint discovery letter brief regarding whether Document
13 16152 is attorney-client privileged. The parties have already tried to informally resolve this
14 dispute in good faith and are currently going through the formal meet and confer process for that
15 letter brief.

16
17 Dated: August 8, 2019

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18
19 By: 

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